

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

VERY REVEREND GEORGES F. de
LAIRE, J.C.L.,

Plaintiff,

v.

GARY MICHAEL VORIS, ANITA CAREY,
ST. MICHAEL'S MEDIA a/k/a CHURCH
MILITANT, and MARC BALESTRIERI

Defendants.

Civil No. 1:21-cv-00131-JL

**DEFENDANTS' ASSENTED-TO MOTION TO EXTEND DATE TO FILE OBJECTION
TO PLAINTIFF'S MOTION FOR JUDGMENT OF LIABILITY**

NOW COME defendants Gary Michael Voris, Anita Carey, and St. Michael's Media, and respectfully state as follows:

1. Defendants request that the Court extend the date by which they must respond to Plaintiff's motion for judgment of liability.
2. This brief extension is required for two reasons. First, undersigned counsel originally signed-on to serve as local counsel in this matter for an out-of-state lawyer who sought admission *pro hac vice*. When the Court denied *pro hac vice* status, undersigned counsel assumed primary responsibility for the file. Second, as the Court is aware from an unrelated matter, undersigned counsel was on a scheduled vacation until October 26, 2023, and accordingly requests additional time to file the defendants' objection.

3. In order to conduct the necessary review of the discovery materials referenced in Plaintiff's pending motion and to produce a substantive response, Defendants request ten additional days to respond to Plaintiff's motion.

4. Defendants therefore request that this Honorable Court extend the date by which they may object to Plaintiff's motion for judgment of liability to November 8, 2023.

5. Counsel for Plaintiff Fr. de Laire assents to this requested relief.

6. No other deadlines will be required to be changed if the Court grants the relief requested in this motion.

WHEREFORE, Defendants respectfully request that this Honorable Court:

A. Extend the date for defendants to object to Plaintiff's Motion for Judgment of Liability to November 8, 2023; and

B. Grant such other relief as may be just and proper.

Respectfully Submitted,

Gary Michael Voris, Anita Carey, and St.
Michael's Media

By their attorneys,
Lehmann Major List, PLLC

Richard J. Lehmann

October 26, 2023

Richard J. Lehmann (Bar No. 9339)
6 Garvins Falls Road
Concord, N.H. 03301
(603) 731-5435
rick@nhlawyer.com

CERTIFICATION

I hereby certify that a copy of this pleading was this day forwarded to opposing counsel via the court's electronic service system.

Richard J. Lehmann

October 26, 2023

Richard J. Lehmann